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November 3, 1993

VIA FEDERAL EXPRESS

Ms. Amy Suzanne Reynolds Reports Analyst Reports Analysis Division Federal Election Commission 999 E Street, N.W. Washington, DC 20463

RE: Ashland Oil Political Action Committee for Employees

("PACE") Identification Number: C00075994

Dear Ms. Reynolds:

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This letter responds to your letter dated October 20, 1993 (copy enclosed) notifying me that a clarification was needed to PACE's April Monthly (3/1/93-3/31/93), May Monthly (4/1/93-4/30/93) and June Monthly (5/1/93-5/31/93) Reports. Your letter requested clarification on the five contributions listed on Schedule B of these Reports which indicate that the contributions were made for "prior general 1992" or "prior primary 1992."

The five contributions in question were used to retire campaign dobts. Specifically, the contributions were as follows:

- The contribution of \$2,000 made to the "Lauch Faircloth for Senate" committee on March 16, 1993 was to retire debt from the 1992 primary election.
- The contribution of \$1,000 made to the "Campbell Victory Fund" committee on March 25, 1993 was to retire debt from the 1992 general election.

Ms. Reynolds November 3, 1993 Page 2

- The contribution of \$500 made to the "Don Johnson For Congress" committee on April 27, 1993 was to retire debt from the 1992 general election.
- The contribution of \$500 made to the "Earl Pomeroy For Congress" committee on April 16, 1993 was to retire debt from the 1992 general election.
- The contribution of \$1,000 made to the "Campbell Victory Fund" committee on May 12, 1993 was to retire debt from the 1992 general election.

I trust that this letter fully responds to your inquiry and I understand that there is no need to amend the April Monthly, May Monthly or June Monthly Reports.

It is PACE's intent to fully comply with applicable law and the rules and regulations of the Commission. We regret any inconvenience caused to your office. If you have any questions or need additional information, please feel free to contact me at 606/329-3600.

Sincerely,

3MP Shawa R. Walker Sharon R. Walker Treasurer

cbk Enclosure

VO.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463.

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Sharon R. Walker, Treasurer Ashland Oil Political Action Committee for Employees (PACE) 1000 Ashland Drive Russell, KY 41114

OCT 20 1993

Identification Number: C00075994

Reference: April Monthly (3/1/93-3/31/93), May Monthly (4/1/93-

4/30/93) and June Monthly (5/1/93-5/31/93) Reports

Dear Ms. Walker:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your reports disclose several federal contributions for "prior general 1992" or "prior primary 1992" on Schedule B supporting Line 23. Please note that while a committee may make contributions to retire a candidate's debts, it may not designate a contribution to an election which has already been held. Please clarify the nature of the referenced contributions.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

Amy Suzanne Reynolds

Reports Analyst

Reports Analysis Division

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Federal Election Commission

ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS

The Commission has added this page to the end of this filing to indicate how it was received. DATE OF RECEIPT Hand Delivered POSTMARKED First Class Mall 11-3-93 Registered/Certified Mail No Postmark Postmark Illegible DATE OF RECEIPT Received from the House Office of Records and Registration DATE OF RECEIPT Received from the Senate Office of Public Records POSTMARKED Other (Specify): and/or DATE OF RECEIPT PREPARER